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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EVELYN JONES,

Plaintiffs,

vs.

EQUIFAX INFORMATION SERVICES LLC, ET
AL.

Defendants.

Case No.: 2:21-cv-02080-RFB-BNW

**JOINT MOTION TO EXTEND
DEFENDANT WYNDHAM
CONSUMER FINANCE, INC.'S
DEADLINE TO RESPOND TO
COMPLAINT**

[SECOND REQUEST]

Defendant, Wyndham Consumer Finance, Inc. (“Wyndham”), by and through its counsel, Armstrong Teasdale LLP, and Plaintiff Evelyn Jones, (“Plaintiff”), by and through her counsel, Kind Law and Freedom Law Firm, hereby submit this Joint Motion requesting that this Court extend the deadline for Wyndham to answer or otherwise respond to the Complaint by another thirty (30) days, or from January 19, 2022, to February 18, 2022. This is the second request to extend this particular deadline.

On November 20, 2021, Plaintiff filed a Complaint against Wyndham among others asserting a claim for violation of the Fair Credit Reporting Act, 15 U.S.C. § 1681. (ECF No. 1). Wyndham was served with the Summons and Complaint on November 30, 2021. On December 15, 2021, this Court approved a stipulation of the parties providing Wyndham an additional 30 days to respond to the Complaint thereby making Wyndham’s deadline to answer or otherwise respond to the Complaint January 19, 2022. (ECF No. 13).

Good cause exists to extend the deadline for Wyndham to respond to the Complaint by another 30 days, or to February 18, 2022. Wyndham continues to identify information and

documents relevant to Plaintiff and the allegations in the lawsuit in order to prepare its response to the Complaint. Wyndham requested additional information from Plaintiff, which was received and is being evaluated. In addition, Wyndham and Plaintiff are discussing a potential resolution of this action that would moot the need for Wyndham to file a response to the Complaint. For these reasons, Wyndham requests more time to respond to the Complaint. Plaintiff does not object to another 30-day extension of the response deadline. The parties believe that this second extension will not unduly delay proceedings as this case as it is still in its infancy and no scheduling order is currently in place. This joint motion is made in good faith and is not filed for improper purposes.

Accordingly, the parties request that this Court enter and order extending Wyndham's deadline to answer or otherwise respond to the Complaint by 30 days, or to February 18, 2022.

DATED this 18th day of January, 2022.

DATED this 18th day of January, 2022.

KIND LAW

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Attorneys for Plaintiff Evelyn Jones

ORDER

IT IS SO ORDERED

DATED: 10:36 pm, January 19, 2022

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE